

In the United States District Court  
For the Western District of Michigan

FILED - GR

October 25, 2021 1:29 PM

CLERK OF COURT  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
BY: im / Scanned: 10-26

Ryan Blake Thornberry  
PLAINTIFF,

COMPLAINT  
Civil Action No.

Kyle Butler; Jack Dieters;  
Fredrick Straubel; Chelsea  
Kasul; the Tonia County  
Sheriff's Office; Robert Dow II;  
REED & HOPPES TOWING &  
RECOVERY, and Bob Hoppes II;  
individually, in their personal and  
professional capacities.  
DEFENDANT.

1:21-cv-903

Hon. Sally J. Berens  
US Magistrate Judge

Plaintiff: Ryan Blake Thornberry, prose, for  
his complaint states as follows:  
I JURISDICTION & VENUE

- 1) This is a civil action brought pursuant to 42 USC  
§§ 1983 and 1985, for deprivation of rights under color of  
state law and conspiracy to deprive.
- 2) This Court has jurisdiction in this matter pursuant  
to 28 USC § 1331.
- 3) This Court has supplemental jurisdiction over any state  
law claims that may arise pursuant to 28 USC § 1367.

## I. JURISDICTION & VENUE (cont.)

4) Venue properly lies in this District pursuant to 28 USC §1391(b)(1) and (2), because the events giving rise to this action occurred in the county of Ionia, Michigan, which lies in the Western District of the State.

## II PLAINTIFF

5) Name: Ryan Blake Throneberry  
Address: 133 W. Adams St., Ionia, MI  
48846

## III DEFENDANTS

6) Defendant # 1: Kyle Butler  
Position/Title: Ionia County District Attorney  
Address: 100 W. Main St., Ionia, MI 48846  
Personal/Professional Capacity: BOTH

7) Defendant # 2: Jack Pieters  
Place of Employment: Ionia Co. Sheriff's Office  
Position/Title: Lieutenant  
Address: 133 W. Adams St., Ionia, MI 48846

### III DEFENDANTS (cont.)

Personal/Professional Capacity: BOTH

8) Defendant #3: Fredrick Straubel

Place of Employment: Tonia Co. Sheriff's Office

Position/Title: Sergeant

Address: 133 W. Adams St., Tonia, MI 48846

Personal/Professional Capacity: BOTH

9) Defendant #4: Chelsea Kasul

Place of Employment: Tonia Co. Sheriff's Office

Position/Title: Deputy Detective

Address: 133 W. Adams St., Tonia, MI 48846

Personal/Professional Capacity: BOTH

10) Defendant #5: Tonia Co. Sheriff's Office

Address: 133 W. Adams St., Tonia, MI 48846

Personal/Professional Capacity: BOTH

11) Defendant #6: Robert Dow II

Place of Employment: FOB-MSP Lakerien Post

Position/Title: Michigan State Police - Trooper

Address: 10300 Howard Ct., Edmore Rd., Lakerien, MI 48850

Personal/Professional Capacity: BOTH

### III DEFENDANTS (cont.)

(12) Defendant #7: REED & HOPPES TOWING & RECOVERY  
ADDRESS: 266 E GRAND RIVER AVE, PORTLAND, ME 04101  
 Personal or Professional Capacity: PROFESSIONAL

(13) Defendant #8: BOB HOPPES, II  
Place of Business: REED & HOPPES (and others)  
Position/Title: OWNER  
Address: 266 E GRAND RIVER AVE, PORTLAND, ME 04101  
Personal/Professional Capacity: BOTH

### IV. STATEMENT OF FACT

(14) On 28 July, 2021, at approx. 1045 AM, a call went out to Ionia Co. Emergency Dispatch regarding a possible Domestic Assault.

(15) There were two callers regarding the alleged incident, the female was identified as one Carriann Marie Vaughn, henceforth referred to as C. Vaughn, and the male caller was identified as the Plaintiff, Ryan Blake Throneberry.

(16) Contact was first made with Plaintiff at the Super 8 Motel located at 7245 S. State  
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#### IV. STATEMENT OF FACT (cont.)

Rd. Tonia, MI 48846. First Deputies to make contact were Defendants Chelsea Kasul, and Jack Pieters of the Tonia County Sheriff's Office.

17) Defendant Robert Dow, II of the Michigan State Police was next on scene, followed by Defendant Friedrich Straubel of the Tonia Co. Sheriff's Office.

18) Defendants Kasul & Pieters began the interview with Mr. Thorneberry, who was visibly upset and in a manic state of mind. Mr. Thorneberry has numerous mental health issues including Bipolar Disorder and Post Traumatic Stress Disorder. Defendant Straubel joined the interview once he arrived on scene just moments later.

19) Mr. Thorneberry informed officers that he had been assaulted by C. Vaughn. Plaintiff's claim was verified by C. Vaughn's own admission in both the 911 call and in her interview w/ Defendant Kasul.

#### IV. STATEMENT OF FACT (Cont.)

20) Mr. Thorneberry told officers that he had not touched C. Vaughn, and at no time did his story of events change or alter in any way.

21) Defendant Kasul interviewed C. Vaughn, and C. Vaughn alleged Plaintiff punched her in the spine with enough force to knock her to the ground. C. Vaughn also stated that she started the altercation by slapping Mr. Thorneberry, and that she was the aggressor.

22) Defendant Pieters allegedly conducted an interview of Gordon Skidmore, henceforth referred to as G. Skidmore, who was also present at the scene of the alleged incident. For some reason unbeknownst to Plaintiff, there is no recording of this interview, nor was there a written statement of G. Skidmore.

23) G. Skidmore told Plaintiff in a recorded conversation that he had informed deputies C. Vaughn had slapped Plaintiff, and that Plaintiff had lost his balance and fell.

#### IV. STATEMENT OF FACT (cont.)

24) Mr. Skidmore also alleged in this phone call that he supplied false testimony at the preliminary exam of Mr. Throneberry because the prosecuting attorney, Kyle Butler, threatened to have Mr. Skidmore arrested if he refused to go along with Mr. Butler's narrative of the events in question.

25) Mr. Throneberry was arrested for Domestic Assault, although he was the victim of an Assault himself, admitted to by the assaulter C. Vaughn, though she was never arrested or charged.

26) On 8/23/21, at the preliminary exam of Mr. Throneberry, C. Vaughn admitted under oath to assaulting Mr. Throneberry, and to being the assessor.

27) On 8/23/21, at the preliminary exam of Mr. Throneberry, Defendant Kasel testified that Mr. Throneberry was arrested because he denied touching C. Vaughn; and C. Vaughn and allegedly G.

IV. STATEMENT OF FACT (cont.)

Skidmore stated to police that Mr. Throneberry punched C. Vaughn in the back. Mrs. Throneberry informed the police it was a lie, and Mr. Throneberry was arrested because he would not give false testimony to the police incriminating himself.

28) When confronted by Mr. Throneberry, Defendant Butler refused to answer why C. Vaughn was not arrested or charged after numerous admissions to assaulting Mr. Throneberry. He went on record later saying Mr. Throneberry being assaulted was inconsequential, that it was pretty much irrelevant, quoting a differential in size and attempting to shield himself behind prosecutorial discretion.

29) After Mr. Throneberry's incarceration, C. Vaughn fraudulently obtained Mr. Throneberry's 02 Trailblazer by pretending to be his significant other, along with all the property inside, valued in excess of \$15,000. Mr. Throneberry reported his property stolen approx. 9/11/21.

30) The report was taken at the Tolia County Jail by Detective Chelsea Samel.



#### IV. STATEMENT OF FACT (cont.)

31) Detective Kasul located C. Vaughn and conducted an interview in which C. Vaughn admitted that she had taken Mr. Throneberry's property from the garage, but alleged a man named "Jesse" took the vehicle and property to "store" it for Mr. Throneberry.

32) Detective Kasul then returned to the Iowa Co. Jail and spoke with Mr. Throneberry, asked about the man named "Jesse," to which Mr. Throneberry made an ID as Jesse Alan Livingston, gave a contact number, an approx. location and vehicle description of Mr. Livingston's truck.

33) Mr. Throneberry made it abundantly clear to Detective Kasul that C. Vaughn never had authorization to do anything regarding Mr. Throneberry's property, that Mr. Throneberry's long time significant other/confidante Melba Rogers was handling Mr. Throneberry's affairs for him, and that

#### IV. STATEMENT OF FACT (cont.)

only Mr. Rogers and Mr. Throneberry's mother, Vicki Adenane, who holds a Durable Power of Attorney have any authorization regarding his property.

34) Mr. Throneberry also informed Kasul that Jesse Livingston wasn't even a friend and there was no viable reason Mr. Livingston would have Mr. Throneberry's property, and that Mr. Throneberry wanted all parties involved arrested and prosecuted to the fullest extent of the law.

35) A month passed with no arrests, Mr. Throneberry received no updates regarding his property. He contacted Defendant Kasul at least 3 times during this period, and Defendant Kasul ignored his messages, and on 10/14/2021, Defendant Kasul sent Mr. Throneberry a message stating that Mr. Throneberry's vehicle had been recovered but herself and whomever else made a call to have it impounded.

#### IV. STATEMENT OF FACT (cont.)

36) Plaintiff's vehicle was impounded at Reed & Hoppes, which is owned by Bob Hoppes, whom holds a contract with Tonia Co. Sheriff's Office.

37) There has been ongoing animosity between Plaintiff and Defendants REED & HOPPEs and Bob Hoppes, II, since approx. May of 2021, when Plaintiff started refusing service to all of REED & HOPPEs' Drivers, in response to REED & HOPPEs' refusal to move a car that Plaintiff had purchased.

38) The animosities grew deeper after a verbal confrontation between Bob Hoppes, II, and Plaintiff.

39) Defendant Bob Hoppes knows that the Blue '02 Chevrolet Trailblazer LT that Defendants KASUL & Tonia County Sheriff's Office had impounded belongs to the Plaintiff. Defendant Hoppes has seen Plaintiff with the



#### IV. STATEMENT OF FACT (cont.)

the vehicle on numerous occasions over the last 6 months since Plaintiff purchased the vehicle. This vehicle is distinct due to the damage to the vehicle, so its unmistakable.

40) Defendant Hoppes and Defendant Reed & Hoppes refuse to release Plaintiff's vehicle, unless Plaintiff produces a title in his name, which they find is impossible due to Plaintiff being in jail, and the title was never changed over because Plaintiff hadn't been able to get into the Mich. Secretary of State due to Covid-19. Plaintiff had an appointment scheduled in September to complete the registration process and get a license plate.

41) Defendant Kasul had no reason to impound the vehicle. Plaintiff made it very clear he wanted all his property turned over to Melba Rogers, his longtime significant other.



## V. LEGAL CLAIMS

42) Mr. Throneberry feels the combined actions of the defendants as a whole establishes a conspiracy to deprive him of his rights in violation of 42 USC §1985.

43) Mr. Throneberry feels the actions of the defendants, especially Mr. Butler, violates his rights under U.S. Const. Amend I, in denying access to the court for redress of grievances; U.S. Const. Amend. XIV, in denying Equal Protection of the Laws by refusing prosecution of C. Vaughn after she made numerous admissions that she assaulted Mr. Throneberry, and made admission to being the aggressor; arresting and charging Mr. Throneberry with a crime with no physical evidence or admission; and stating on record that C. Vaughn's admitted assault on Mr. Throneberry was inconsequential, that it didn't matter.

44) Mr. Throneberry also feels he was subjected to unreasonable seizure of his property, albeit indirectly, in the defendants blatant refusal to remedy the theft of his property by C. Vaughn. 13

## V. LEGAL CLAIMS

J. Livingston, which was solely in their authority to do so.

45) Plaintiff feels he was deprived of his property without due process of law. His property was unlawfully seized by ICE, though no arrests were made.

## VI. PRAYER FOR RELIEF

Wherefore Plaintiff Ryan Blake Thorneberry prays this Court enter judgement in the favor of!

46) A declaration that the defendants' actions did

in fact constitute a violation of Plaintiff's rights, individually.

47) Compensatory Damages in the amount of \$60,000.00, individually, against each defendant.

48) Nominal Damages in the amount of \$1.00.

49) Punitive Damages in the amount of \$100,000.00 individually, against each defendant.

## VI. PRAYER FOR RELIEF (cont.)

49) A preliminary injunction against the defendants including the Ionia County Jail (part of Ionia County Sheriff's Office) ordering that they must provide Plaintiff access to the same resources an attorney would have, and a minimum of access to law library material for 8 hours per week.

50) Recovery of all fees and costs incurred by the Plaintiff in this action.

51) Any other forms of relief this Court seems appropriate.

Date: 10/17/21

Respectfully Submitted,  
Ryan Blake Throneberry/rbt

133 W. Adams St.  
Ionia, MI 48846

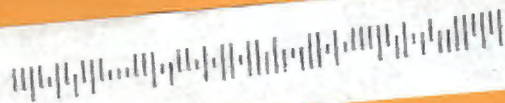
### VERIFICATION

By my signature below, I swear the foregoing instrument is both true and correct, to the best of my knowledge.

Date: 10/17/21

Ryan B. Throneberry/rbt

Ryan Throneberry  
133 W. Adams St.  
Tonia, MT 48846







6th U.S. District Court Clerk  
Western District of Michigan  
Gerald R. Ford U.S. Courthouse  
110 Michigan St. NW  
Grand Rapids, MI 49503